

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

APR 15 2019

David J. Bradley, Clerk

United States of America

v.

Brian Alan HERRERA-Valenzuela (Y.O.B. 1993)  
Citizenship: MexicoCase No. *M-19-0831-M**Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*21 USC § 952  
21 USC § 841*Offense Description*

knowingly and intentionally import into the United States from Mexico approximately 23.16 kilograms of methamphetamine, a Schedule II controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 23.16 kilograms of methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

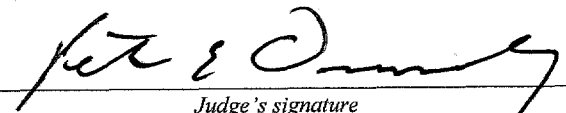
See Attachment "A"

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr.4.1,  
and probable cause found on:

Sworn to before me and signed in my presence.

Date: 04/15/2019*8:05 am*City and state: McAllen, Texas*Complainant's signature*

Shane Petrosky, HSI Special Agent

*Printed name and title**Judge's signature*

U.S. Magistrate Judge Peter E. Ormsby

*Printed name and title*

ATTACHMENT A

On April 14, 2019, a blue Ford Five Hundred driven by Brian Alan HERRERA-Valenzuela attempted to make entry into the United States via the Hidalgo, Texas Port of Entry. At primary inspection, Customs and Border Protection Officer (CBPO) Marin Chapa questioned HERRERA-Valenzuela as to the purpose of his travel in the United States to which he replied he was traveling to Hidalgo, Texas for shopping. CBPO Chapa observed HERRERA-Valenzuela had a change in demeanor during questioning about his crossings. CBPO Chapa referred the Ford Five Hundred and HERRERA-Valenzuela to secondary inspection.

At secondary inspection, CBPO Romualdo Iglesias escorted the vehicle to the Z-Portal X-Ray machine where CBPO Aramis Rodriguez performed a non-intrusive scan of the vehicle and observed anomalies in the tires. The Ford Five Hundred was then parked in the secondary area where an intensive examination of the tires was conducted which subsequently revealed forty (40) packages containing a white crystalline substance weighing approximately 23.16 kilograms. The white crystalline substance in the packages field tested positive for the properties of methamphetamine.

HSI McAllen Special Agents conducted an interview of HERRERA-Valenzuela. During the interview HERRERA-Valenzuela stated he was the registered owner of the vehicle. HERRERA-Valenzuela further stated he knew he was transporting an unknown type or quantity of narcotics in the vehicle tires. HERRERA-Valenzuela stated he was going to be paid approximately seven thousand (\$7,000) United States Dollars for transporting the narcotics.